

**REMARKS**

By this amendment, Applicant has amended claims 19, 32, and 38. As a result, claims 19-38 remain pending in this application. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicant does not acquiesce in the correctness of the objections and rejections and reserves the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 19-37 are rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite. With respect to claim 19, the Office alleges that the claim fails to recite a processor. In response, Applicant has amended claim 19 to now recite at least one processor. Further, the Office alleges that claim 32 also includes the same deficiency. In response, Applicant has amended claim 32 to include at least one computer. Applicant notes that a computer inherently includes a processor. As a result, Applicant respectfully requests withdrawal of the rejection of claims 19-37 as allegedly being indefinite.

Additionally, the Office rejects claims 19-38 as allegedly being unpatentable over U.S. Patent No. 6,006,277 (Talati) in view of "Information Warehouse in the Finance Industry," (IBM), and further in view of U.S. Patent No. 6,185,545 (Resnick). Applicant respectfully traverses this rejection.

Initially, Applicant strenuously objects to the Office's interpretation of Talati as allegedly being analogous to a "banking transaction processing system." In support of its conclusion, the Office alleges that (1) a source computer for Talati can comprise IBM's Customer Information Control System (CICS); (2) CICS is a transaction processing system; and (3) financial

applications, such as banking transactions, use CICS. As a result, the Office concludes that the teachings of Talati are analogous to systems and methods for processing banking transactions.

Initially, Applicant notes that Talati is devoid of any mention of financial and/or banking transactions. This is due to the fact that the teachings of Talati are not related to financial and/or banking transactions. In particular, Talati "relates to a virtual software machine for providing a virtual execution environment in a target computer for an application software program having one or more execution dependencies that are incompatible with a software execution environment on the target computer." Abstract. One possible target computer is a transaction processing system, such as IBM's CICS. The term "transaction" is a term of art that has different meanings in different contexts. For example, in banking, the term represents various banking products and services such as account deposit/withdrawal/transfer, credit/debit card purchases, a loan, etc. To this extent, a user, such as a bank customer, typically initiates each transaction, and the completion of each transaction is from the user's perspective.

In sharp contrast, as shown in Exhibit A, in a computing environment, the term "transaction" means "an activity or request." For example, a transaction can comprise a database update, a file read/write, etc. To this extent, transactions in the computing environment are the building blocks for numerous types of applications that may be executed by a particular computing environment. Further, an application transaction, such as a business transaction, can require numerous transactions in the computing environment. As a result, the discussion of transactions in a computing environment is not related to transactions for any particular application that may be executed by the computing environment.

This is illustrated further by understanding IBM's CICS as illustrated by Exhibit B. CICS is a transaction processing (TP) monitor that provides transaction processing for IBM mainframes. To this extent, CICS manages the transfer of data between multiple terminals and application programs. As a result, CICS is not limited to, nor does it teach, transactions specific to any particular application. In contrast, CICS implements layers 4, 5, and 6 of IBM's Systems Network Architecture (SNA). In SNA, layer 4 comprises the transport layer that ensures delivery of an entire file or message, layer 5 is a session layer that manages sessions and maintains order in the data flow, and layer 6 is a presentation layer that handles data encryption, conversion, etc. Each of these layers provide the functionality that is then used by applications in layer 7. To this extent, layers 4-6 are implemented as part of the computing environment, independent of any type of application, and are specific to the particular computing environment.

In this regard, the Office misinterprets the IBM reference. In particular, this reference discusses one complete solution offered by IBM for the finance industry. To this extent, since IBM is offering the solution, IBM products, such as CICS, are used. However, this does not imply that CICS is specific to the finance industry. For example, as shown in the Abstract on page iii of IBM, the information warehouse architecture can be applied to various products and industry applications, including the insurance industry and the retail industry. Consequently, CICS provides support for any type of application that executes on an IBM mainframe, such as e-mail, a web browser, word processing, etc. As a result, Talati's discussion of a transaction processing system, such as CICS, is not related to or suggest banking transaction processing systems.

Even if, *arguendo*, Talati and CICS are analogous to banking transactions, Applicant respectfully submits that claims 19-38 are patentable over Talati in combination with one or more of the cited references. In particular, with respect to claims 19 and 38, Talati fails to disclose, *inter alia*, a business platform that comprises platform independent program code. Talati addresses the situation in which application programs written for a source computer are incompatible with a target computer. See, e.g., col. 3, lines 61-65. This may be due to an incompatibility at the hardware and/or software level of the target computer. In sharp contrast, the claimed business platform comprises platform independent program code. As a result, the claimed business platform can be implemented on any type of computing system (e.g., CICS, a micro-computer, etc.). The claimed invention of claim 19 addresses variations between computing platforms by including system processing functions that provide a platform independent interface between the business platform and a server. As a result, Applicant respectfully requests withdrawal of the rejection of claims 19 and 38.

In support of its rejection of claims 19, 32, and 38, the Office apparently alleges that the transaction processing system applications of Talati correspond to the claimed set of application transactions included in the business platform, while the virtual interface system of Talati corresponds to the claimed main module included in the business platform. Initially, Applicant notes, as discussed above, that the claimed set of application transactions and main module are platform independent, whereas Talati's transaction processing system applications (source computer) and virtual interface system (target computer) are each platform specific.

Additionally, Applicant notes that Talati's virtual interface system does not initiate the transaction processing system applications in response to anything, let alone based on a message.

In sharp contrast, the virtual interface system is linked to the previously developed application program, and a portion of the virtual interface system “carries out one or more ‘tasks’ required by the application program.” See, e.g., col. 2, lines 56-67, col. 4, lines 50-65. Consequently, contrary to the Office’s assertion, Talati’s virtual interface system does not initiate Talati’s transaction processing system applications in response to a received message. As a result, Applicant respectfully requests withdrawal of the rejection of claims 19, 32, and 38.

With further respect to claims 19 and 32, the Office alleges that the virtual interface system of Talati discloses Applicant’s claimed set of system processing functions. To this extent, the Office alleges that Talati’s virtual interface system discloses both Applicant’s claimed main module, which is included in the business platform, and Applicant’s claimed system processing functions, which provide a platform independent interface between the business platform and a server. Applicant respectfully submits that this interpretation is not possible. In particular, by definition, a module (e.g., Applicant’s main module) that is included in the business platform cannot provide a platform independent interface between the business platform and a server. As a result, Applicant respectfully requests withdrawal of the rejection of claims 19 and 32.

With still further respect to claim 19, the Office alleges that Talati’s virtual interface system discloses the claimed interface. In particular, the Office alleges that the virtual interface system “allows [a] user to add each of a new application transaction and [a] new knowledge block.” In support of this conclusion, the Office includes in bold that Talati’s virtual interface system enables application programs to run irrespective of the hardware environment. Further, the Office cites a portion of Talati that discusses how the application programs execute.

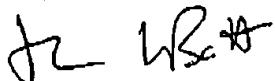
Applicant respectfully submits that these portions of Talati are unrelated to the claimed ability for a user to add, for example, platform independent program code for a new application transaction in order to add support for processing a new banking transaction. As a result, Applicant respectfully requests withdrawal of the rejection of claim 19.

With further respect to claims 19, 32, and 38, the Office alleges that Resnick discloses the claimed ability of an application transaction to both process a banking transaction and undo the banking transaction. Initially, Applicant notes that Resnick cannot be properly combined with Talati since the two are in unrelated fields. Regardless, Applicant further notes that Resnick fails to teach anything analogous to an application transaction that includes both the process and undo functionality or a main module that initiates the application transaction based on the message. Further, the Office cites no motivation included in either reference for implementing both the process and undo functions in a single application transaction. With further respect to claims 19 and 32, the Office fails to cite any reference that allegedly discloses the process and undo functionality included in the set of knowledge blocks. Applicant's claimed application transaction provides modularity and portability that is advantageous in developing the banking transaction processing system. As a result, Applicant respectfully requests withdrawal of the rejection of claims 19, 32, and 38.

Applicant respectfully submits that the various dependent claims are patentable for the above-stated reasons as well as their own patentable feature(s). Further, Applicant respectfully submits that the independent claims are patentable for additional claimed features. To this extent, Applicant reserves the right to argue the Office's interpretation of Talati, IBM, Resnick, etc., as allegedly disclosing one or more features of each of the claims.

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,



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